

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

_____ /

MOTION TO FILE SEALED DOCUMENT

Plaintiffs move to file the Declaration of Vanessa Baehr-Jones and attached Exhibits 1-4 under seal. Sealed filing is appropriate here because the declaration and exhibits reveal information about an ongoing public corruption investigation, including the names and identities of the investigating agents and prosecutors, as well as sensitive information about cooperating witnesses in this investigation. *See United States v. Valenti*, 987 F.2d 708, 714 (11th Cir.), *cert. denied*, 510 U.S. 907 (1993).

Respectfully submitted,

HMC Civil Rights Law, PLLC

s/ Heather Moore Collins

Heather Moore Collins (# 026099)

Caroline Drinnon (#037016)

Ashley Shoemaker Walter (#037651)

7000 Executive Center Dr., Suite 320

Brentwood, TN 37027

615-724-1996

615-691-7019 FAX

heather@hmccivilrights.com

caroline@hmccivilrights.com

ashley@hmccivilrights.com

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

Pro Hac Vice

Advocates for Survivors of Abuse PC

4200 Park Boulevard No. 413

Oakland, CA 94602

(510) 500-9634

vanessa@advocatesforsurvivors.com

s/ Elizabeth Kramer

Julie Erickson (California Bar # 293111)

Elizabeth Kramer (California Bar # 293129)

Kevin Osborne (California Bar #261367)

Pro Hac Vice

Erickson Kramer Osborne LLP

44 Tehama St.

San Francisco, CA 94105

415-635-0631

julie@eko.law

elizabeth@eko.law

kevin@eko.law

Attorneys for Plaintiffs and Proposed Class

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on April 29, 2024 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 Email: lisa@hbm-lawfirm.com</p> <p>Emily C. Taylor WATSON, ROACH, BATSON & LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 Email: etaylor@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p>	<p>Daniel H. Rader III Daniel H. Rader IV MOORE, RADER & YORK PC 46 N. Jefferson Avenue P.O. Box 3347 Cookeville, TN 38502-3347 danrader@moorerader.com danny@moorerader.com <i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law <i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 E-mail: kgrant@rswlaw.com <i>Counsel for Justin Jenkins in his individual capacity</i></p>
--	--

/s Heather Moore Collins

Heather Moore Collins